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March 13, 2025

**VIA ECF**

The Honorable Renée Marie Bumb  
United States District Court Judge  
District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets, Room 1050  
Camden, NJ 08101

**Re: *In re: Valsartan, Losartan, and Irbesartan Products Liability  
Litigation.*, U.S. District Court for the District of New Jersey; Case  
No. 1:19-md-02875**

Dear Judge Bumb:

Following meet and confers between the parties and as discussed with the Court during the March 3, 2025 Case Management Conference, attached is the parties' proposed Case Management Order establishing a product identification show cause process for manufacturer defendants. Please let us know if there is anything else that Your Honor requires and thank you once again for your careful consideration of these issues.

Sincerely,

/s/ Steven M. Harkins  
Steven M. Harkins

Enclosure

cc: All counsel of record (*via ECF*)